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File No. 44219

September 22, 2005

BY HAND DELIVERY

Regional Planning Commission
County of Los Angeles
320 West Temple Street
Los Angeles, California 90012

Re: **Clearman's Village; Regional Planning Commission Hearing Date: September 28, 2005; Conditional Use Permit and Zone Change No. 03-147-(5)**

Dear Commissioners:

We represent the applicant for this project, who proposes to redevelop Clearman's Village at the intersection of Rosemead Boulevard and Huntington Drive.

The Planning Commission held public hearings regarding the project on January 19, 2005 and July 20, 2005, and the hearing was continued to September 28, 2005. Since the last hearing, the applicant has continued to reach out to the community through several meetings and open houses, has responded to comments regarding the traffic study and has volunteered new conditions based on input from the community. Notwithstanding that the project will have no significant traffic impacts, the applicant has volunteered to fund neighborhood traffic calming measures, if warranted by future monitoring. This is in addition to the $300,000 fund that the applicant previously proposed for community enhancement projects. Moreover, this is in addition to the approximately $1 million dollars which the applicant will spend to construct the traffic improvements which the Department of Public Works has requested.

The Applicant Has Continued to Reach Out to the Community

The applicant has continued its community outreach after the July 20, 2005 Planning Commission hearing. The applicant held numerous meetings with area residents and has facilitated meetings with Public Works to discuss residents' traffic concerns. These meetings have included open houses aimed at reaching out to the entire surrounding community as well as individual meetings focused on the concerns of

particular neighborhoods. A detailed list of community outreach activities since July 20, 2005 is attached at tab 1.

For example, the applicant held separate meetings with Fairview Avenue residents, the Michillinda Park Association Board of Directors, and the Chapman Woods Association Board of Directors. In addition, the applicant, including the project team and expert consultants, held a second open house which was attended by 50-60 area residents. The applicant has scheduled further community meetings in advance of the July 28, 2005 Planning Commission hearing.

The Applicant Has Further Explained The County-Approved Traffic Study

The project's traffic engineer attended community meetings to explain the results of the traffic study for the project and answer any questions. In addition, the traffic engineer prepared visual aids and exhibits to graphically illustrate the traffic study's analysis and conclusions. These exhibits are attached.

At Tab 2 is a comparison of existing and post-project traffic at the PM peak hour along Huntington and Rosemead. The comparison illustrates, through bar graphs, the insignificant increase in traffic on each street. Tab 3 is a similar comparison which shows the insignificant increase in traffic along Colorado, Del Mar, California, and Rosemead.

At Tab 4 are maps of the area which show the inbound and outbound traffic volumes attributable to the project at the PM peak hour.

At Tab 5 is an comparison of the existing and future delay times at the intersection of Rosemead and Huntington at the PM peak hour. This exhibit illustrates how the mitigation measures incorporated into project, such as the two left-turn lanes, will actually improve existing traffic conditions. Indeed, it shows how the project will reduce existing motorist delays by 13 percent.

At Tab 6 is a comparison of the traffic volumes generated by Kohl's versus other types of uses which could be built on the site, such as a supermarket or a discount store. The comparison shows that Kohl's generates significantly less traffic than those other uses, especially during the PM peak hour.

In addition, the traffic engineer has responded to comments on the traffic study, including a letter from Jones Engineering in Bellingham, Washington. This response has been provided to the County. As analyzed and explained by the traffic study and in the traffic engineer's careful response to the Jones Engineering letter, with

the proposed traffic mitigation measures, the project will not result in any significant traffic impacts.

The Applicant Has Volunteered Additional Funds For Traffic Calming Measures

As discussed above, the project will not have any significant traffic impacts with the traffic mitigation measures imposed. However, several neighborhood groups have voiced concerns over existing traffic in their neighborhoods and the possibility of an increases in cut-through traffic. The Applicant volunteered to pay for monitoring (*i.e.* traffic counts) in the Michillinda Park and Chapman Woods areas and along Fairview Avenue. Initial monitoring has already taken place at locations on the map at Tab 7. The applicant has volunteered to pay for additional monitoring after the Kohl's is open for business.

The applicant has agreed to three separate funds dedicated to possible future traffic calming measures. The applicant will create a $25,000 fund to pay for traffic calming measures on or near Fairview Avenue. As to the Michillinda Park and Chapman Woods areas, the applicant has agreed to pay up to $50,000 per area if the Director of Public Works determines that traffic calming measures are warranted.

These funds are in addition to the $300,000 that the applicant has volunteered for community enhancement projects which may include traffic calming measures and the beautification of the Rosemead Boulevard median. Of course, all of these voluntary efforts are in addition to the approximately $1 million for traffic improvements which the Department of Public Works has recommended already.

The Applicant Has Agreed to Additional "Good-Neighbor" Conditions

Based on input from the community, the applicant has agreed to additional conditions such as (1) installing a gate on the Fairview Driveway which would be closed from 9:00 PM to 6:00 AM daily, (2) paying and cooperating with residents to establish a permit-parking district for residents along Fairview and Sultana, (3) providing on-site security to monitor the parking areas until midnight every day and (4) installing all feasible measures at the Fairview driveway to direct traffic towards Rosemead. In addition, the applicant has incorporated the community's input into its landscape plans and will coordinate with the Department of Public Works to plant up to five new trees on the Huntington Drive median.

Community Support Continues to Increase

The surrounding community has responded to the applicants' outreach with continuing and increasing support of the project. The attached table at tab 8 summarizes public support of the project. As of September 15, 2005, the applicant has received over 833 support cards from residents and businesses in the area.

We hope that the above information is helpful to you in your consideration of this important commercial project. We respectfully request that the Commission close the public hearing and direct its staff to prepare, for your subsequent review, a Final Environmental Impact Report and appropriate conditions for approval of this important project.

Sincerely,

Charles J. Moore

CJM/JRR
Attachments
44219\1169741v2
cc: James Hartl
Frank Meneses
Russell Fricano
Kim Szalay
Lawrence Hafetz
Randine Ruiz
Mark Nelson

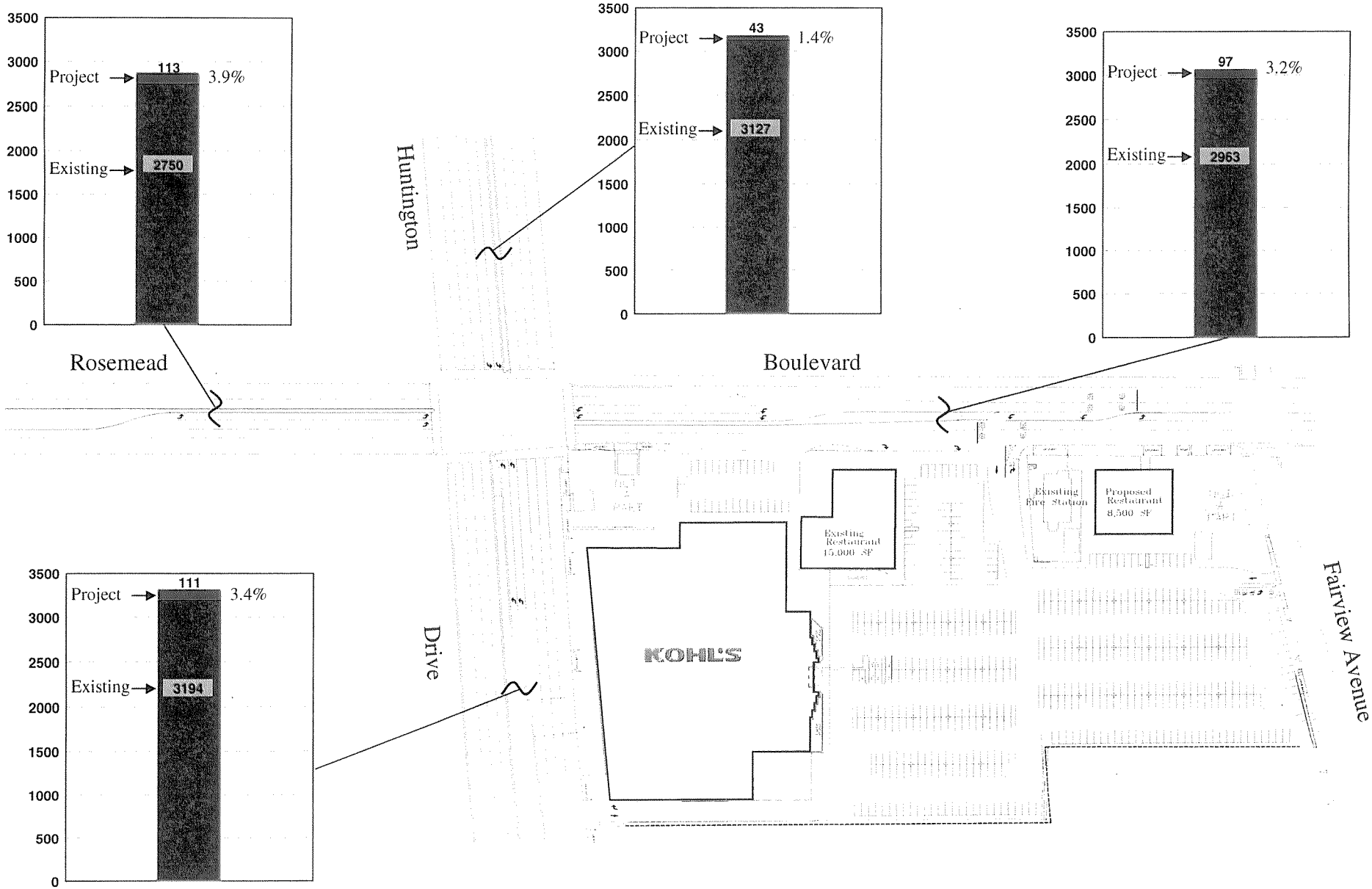
Community Outreach – Post July 20, 2005 LA County Regional Planning Commission Meeting/Hearing

Beginning in November 2003, and continuing until the July 20, 2005 Planning Commission meeting, representatives of Clearman's Village and Kohl's conducted extensive community outreach to neighbors, homeowner associations, local businesses, local elected officials and community leaders. The details of those activities were provided to the Planning Commission prior to the July 20 hearing and were included in the staff report.

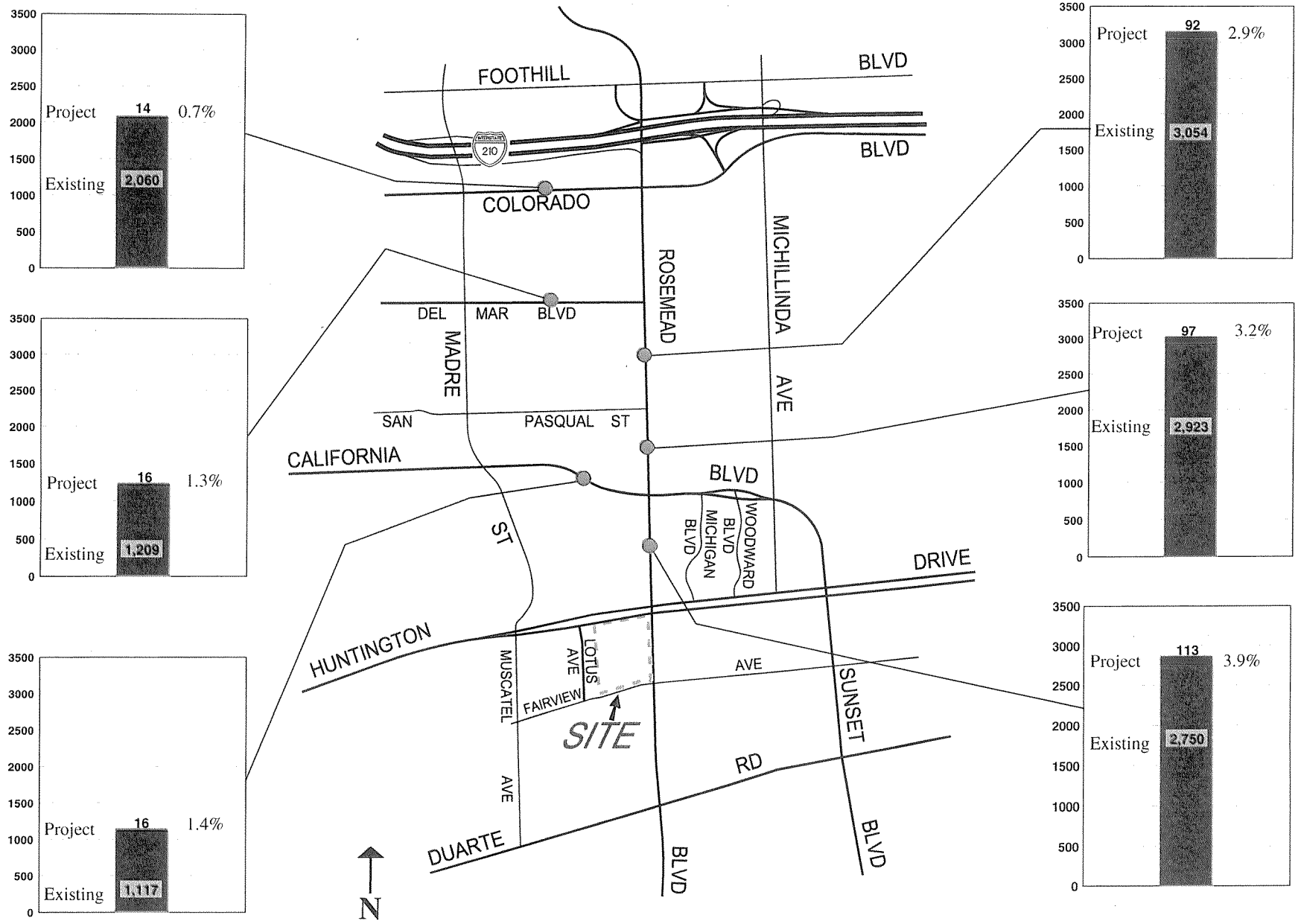
This summary covers the period from the July 20 Planning Commission meeting through the September 28, 2005 Planning Commission meeting:

- July 20 - attended and presented project information at the public hearing conducted by the County Regional Planning Commission
- July 28 - met with William Winter, Dept. of Public Works, along with Chad Morgan, Fairview Avenue representative, to follow-up on July 13 Fairview meeting to discuss traffic issues and recommendations
- August 16-18 – conducted traffic and speed monitoring on Fairview Avenue, Lotus and Muscatel Avenues to establish baseline traffic/speed data
- August 16 – met with Fairview Avenue residents to further discuss traffic and landscaping issues, recommendations, mitigations and conditions; held numerous follow-up phone calls with Chad Morgan/Fairview representative to further develop mitigations and conditions
- August 17 - mailed more than 1,000 invitations to all members of Michillinda Park Association and neighboring residents for the second open house event scheduled for September 13, 2005 (included residents living within 1,000 feet of the site and all attendees of meetings hosted by Clearman's Village and Kohl's)
- August 19 – mailed more than 450 open house invitations to residents of Chapman Woods
- August 24 – met with Michillinda Park Assn. board of directors to discuss project issues and recommendations; meeting also attended by members of Chapman Woods Assn. and Fairview Avenue; conducted numerous phone calls with Lucy Jarrad, president, Michillinda Park Assn. re: follow-up; conveyed voluntary offer to conduct traffic/speed monitoring and to create a "traffic contingency fund" for Chapman Woods and Michillinda Park
- September 7 - provided information to the San Gabriel Valley Tribune/Pasadena Star-News about the "open house" being conducted on September 13, including artist renderings, fact sheets, summaries of mitigations, etc.
- September 6-8 - voluntarily conducted traffic monitoring at two locations in Michillinda Park to establish baseline traffic/speed data

- September 8 – met with Chapman Woods Assn. board of directors to discuss issues, concerns and recommendations related to traffic, landscaping, etc.; meeting also attended by Michillinda Park Assn. board of directors, Kim Szalay, and Fairview residents; conveyed voluntary offer to conduct traffic/speed monitoring and to create a "traffic contingency fund" for Chapman Woods and Michillinda Park
- September 13-15 - voluntarily conducted traffic monitoring at six locations in Chapman Woods to establish baseline traffic/speed data
- September 13 - hosted and conducted the "open house" at St. Anthony's attended by approximately 50-60 residents
- September 14 – conducted follow-up meeting with Chapman Woods Assn. board of directors, Michillinda Park Assn. board of directors and Fairview residents to further review mitigations and conditions
- September 21 - meeting scheduled with Lotus Avenue residents to address traffic and other project-related issues and recommendations
- Ongoing - displayed and disseminated information about the project plans at the *North Woods Inn* and the *Galley Restaurant* on a daily basis
- Ongoing - obtained more than 800 cards/letters of support from residents in Pasadena, San Gabriel, San Marino, Temple City, Rosemead, Arcadia and neighboring communities.



COMPARISON OF EXISTING AND PROJECT TRAFFIC
PM PEAK HOUR



COMPARISON OF EXISTING AND PROJECT TRAFFIC
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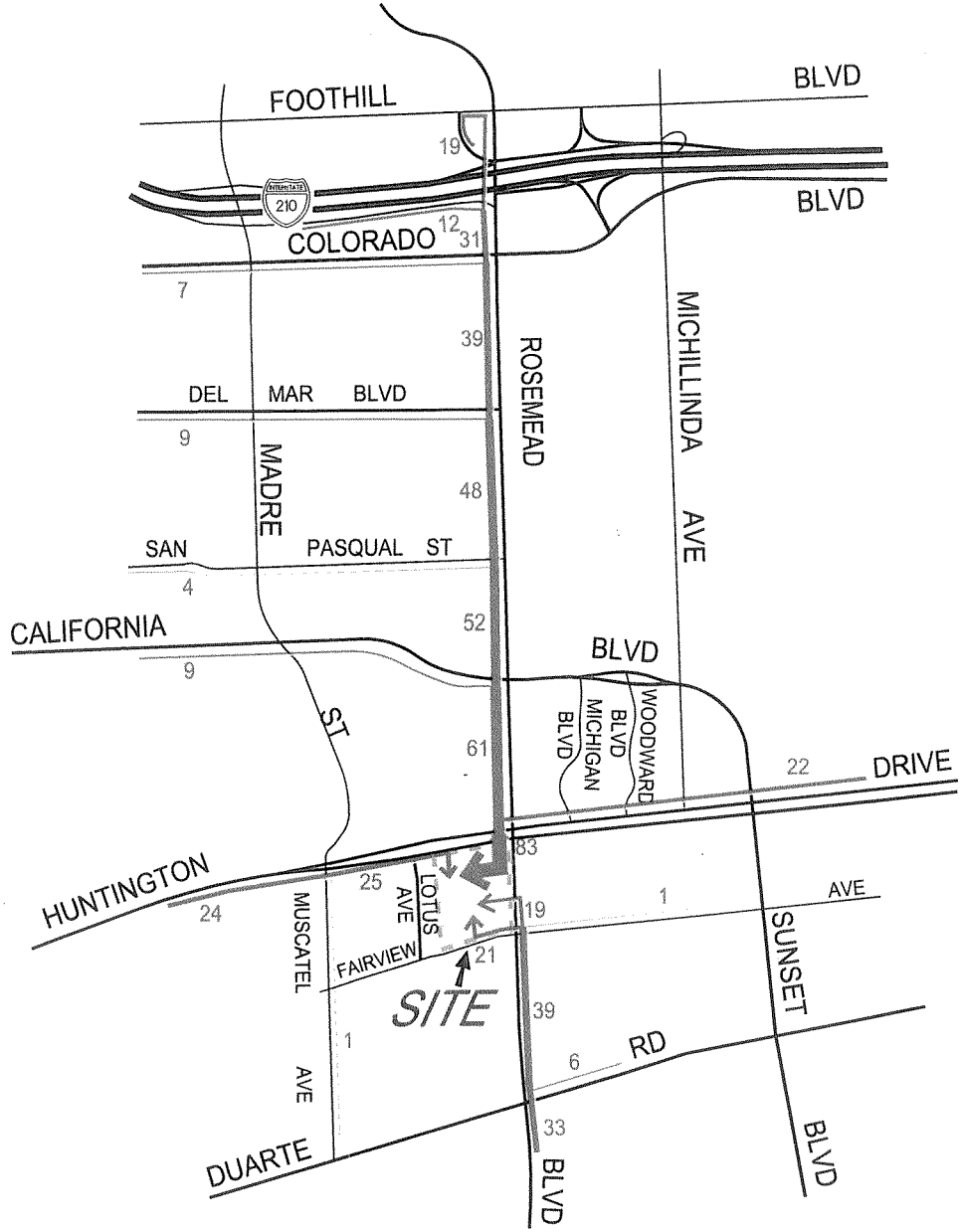

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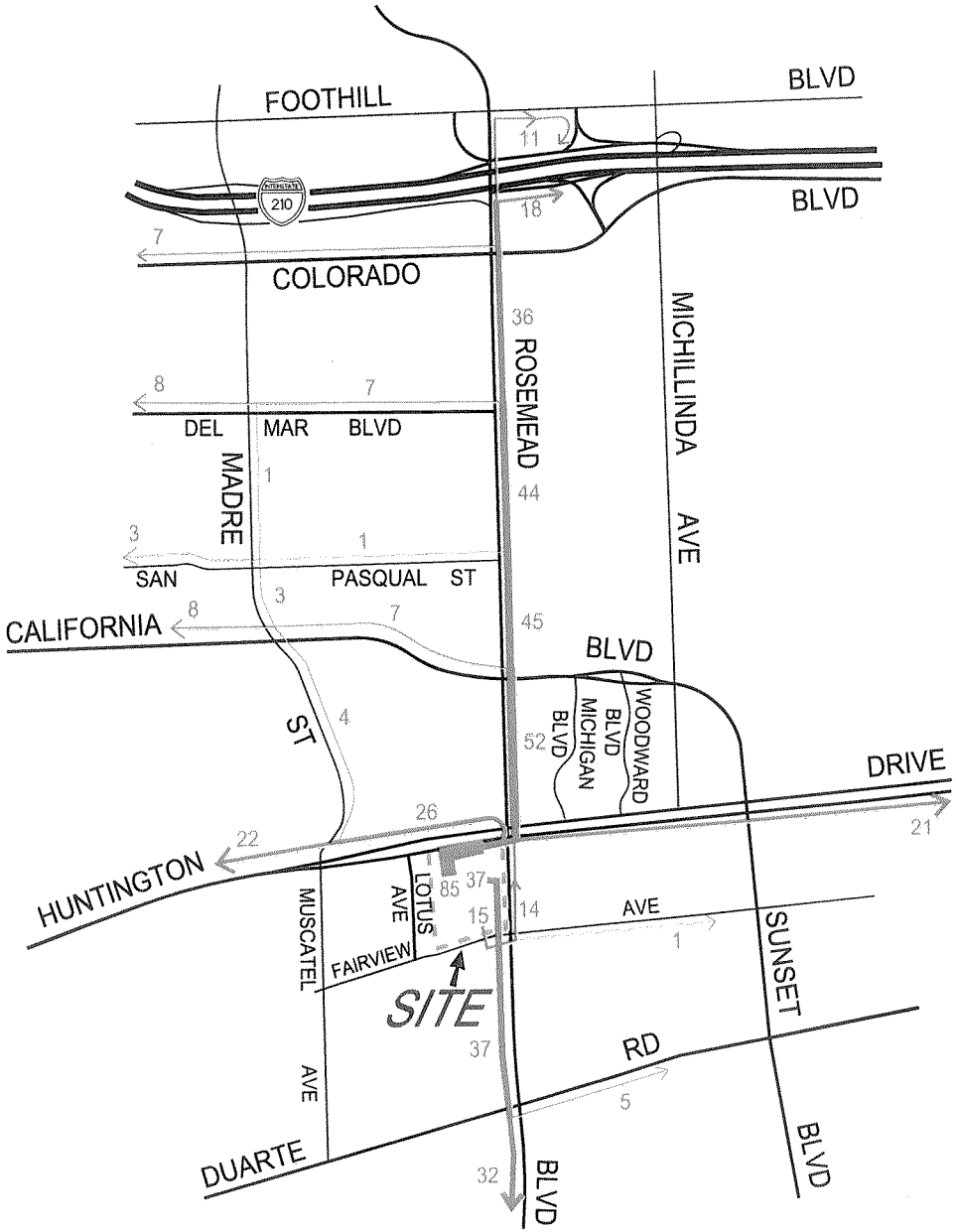
INBOUND PROJECT TRAFFIC VOLUMES
PM PEAK HOUR



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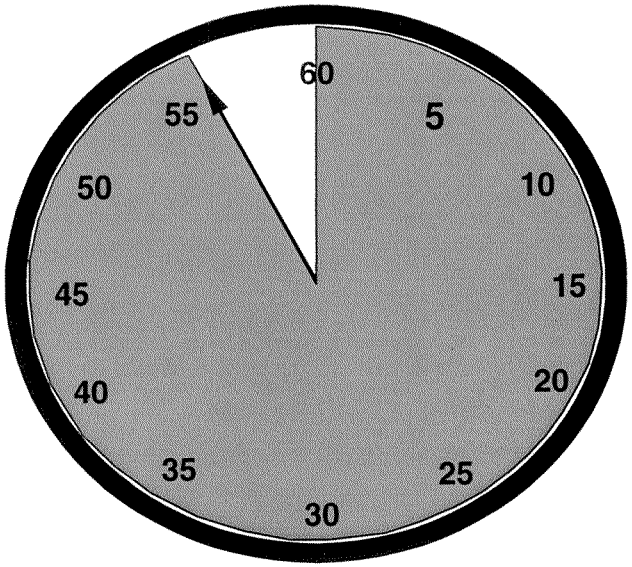
OUTBOUND PROJECT TRAFFIC VOLUMES
PM PEAK HOUR

EXISTING

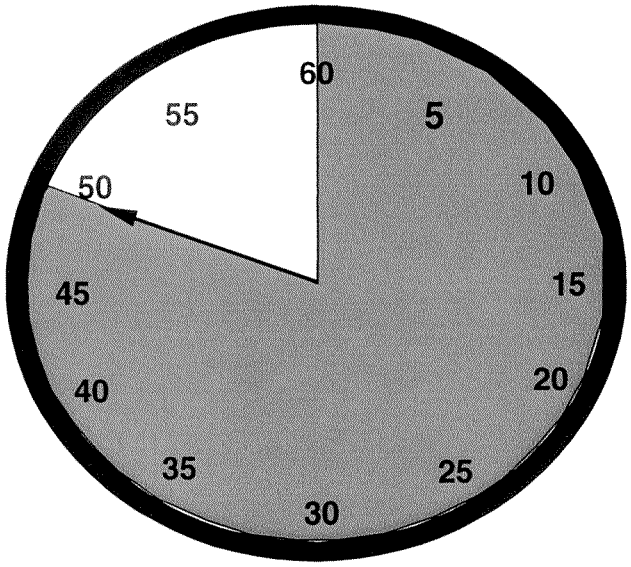
- EXISTING CLEARMAN'S VILLAGE
- ONE LEFT-TURN LANE AT ROSEMEAD/HUNTINGTON



AVERAGE MOTORIST DELAY:
56.3 SECONDS

FUTURE

- CLEARMAN'S VILLAGE WITH KOHL'S
- TWO LEFT-TURN LANES AT ROSEMEAD/HUNTINGTON



AVERAGE MOTORIST DELAY:
49.2 SECONDS (13% Improvement)

EXISTING AND FUTURE AVERAGE DELAY AT ROSEMEAD/HUNTINGTON INTERSECTION PM PEAK HOUR

PROPOSED PROJECT - KOHLS

- NEW KOHL'S STORE (88,407 s.f.)
- EXPANDED GALLEY (4,500 s.f.)

- NET NEW TRIPS:
  - Daily – 3,164
  - AM Peak Hour – 68
  - PM Peak Hour - 286

OPTION 1 - SUPERMARKET

- NEW SUPERMARKET (50,000 s.f.)
- ANCILLARY RETAIL (10,000 s.f.)
- EXPANDED GALLEY (4,500 s.f.)

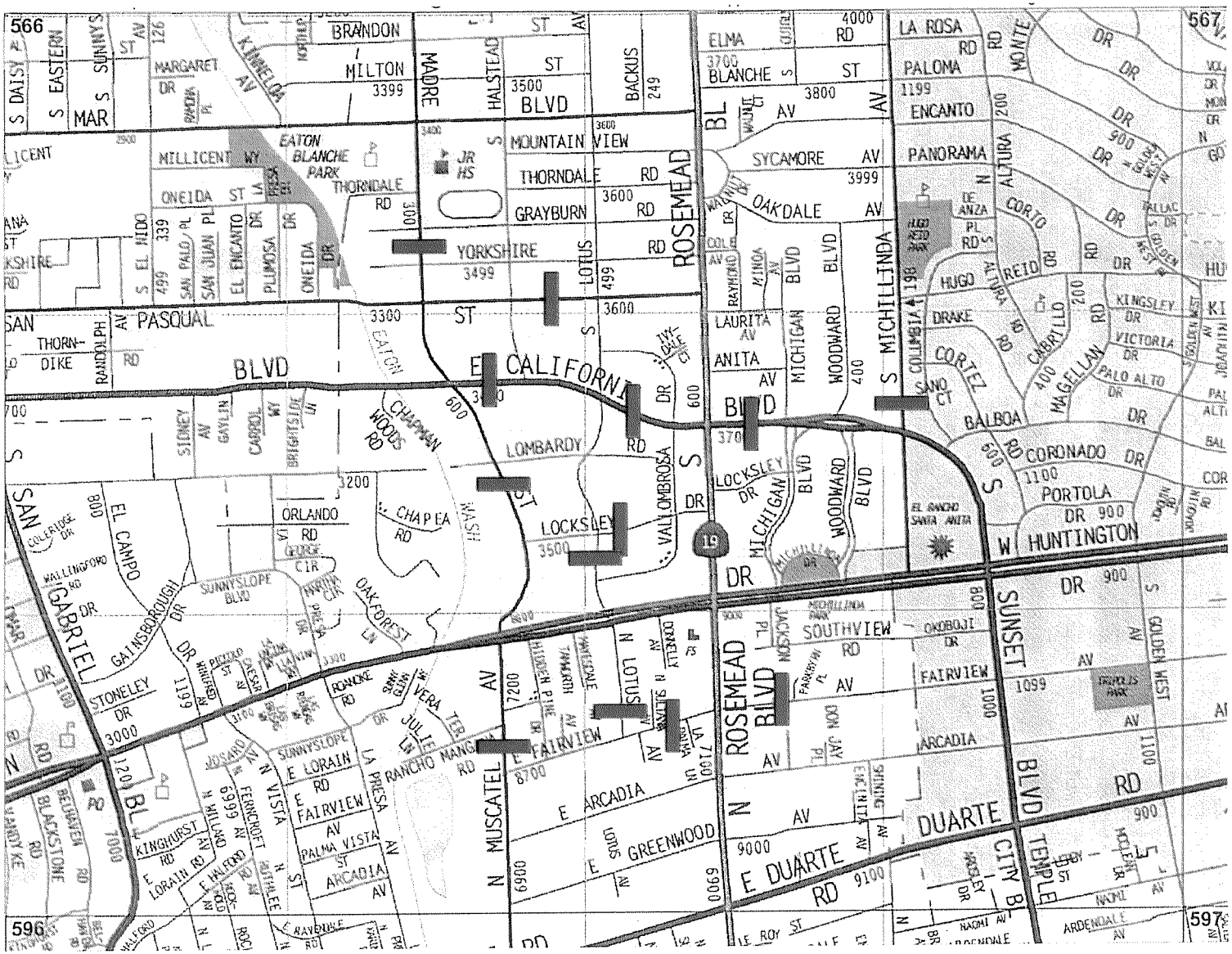
- NET NEW TRIPS:
  - Daily – 4,911
  - AM Peak Hour – 149
  - PM Peak Hour - 516

OPTION 2 – DISCOUNT STORE

- NEW DISCOUNT STORE (75,000 s.f.)
- EXPANDED GALLEY (4,500 s.f.)

- NET NEW TRIPS:
  - Daily – 3,572
  - AM Peak Hour – 39
  - PM Peak Hour - 335

COMPARISON OF REDEVELOPMENT OPTIONS FOR CLEARMAN'S VILLAGE



LOCATION OF ADT/SPEED SURVEYS

CLEARMAN'S VILLAGE & KOHL'S SUPPORTERS

Community	Supporters Mar. 1 - July 20, 2005	Supporters July 20 – Sept. 15	Total Supporters as of September 15, 2005
91107/PASADENA	47	44	91
SAN GABRIEL, TEMPLE CITY	81	51	132
ARCADIA, ROSEMEAD	70	34	104
OTHER SAN GABRIEL VALLEY *	38	86	124
L.A. COUNTY/OTHER	292	84	376
LOCAL BUSINESSES	6	-	6
TOTALS	534	299	833

(* Other San Gabriel Valley includes: Monrovia, Alhambra, Altadena, Sierra Madre, San Marino)

Benefits of Requested Zone Change

Clearman's Village

- ✓ The Clearman's Village property is a unique economic resource. In the region, there are no similar, large eight-acre sites, located along an important commercial corridor at the intersection of two major highways.

- ✓ The size of the property presents an important opportunity to redevelop the site by removing the deteriorating and outdated small novelty stores with a well-known department store, which will benefit the neighboring residents by providing a new and unique shopping opportunity and preserving the popular Northwoods Inn and Galley restaurants.

- ✓ The zone change would consolidate the one existing multiple residence zone classification and the three existing commercial zone classifications (C-1, C-2, C-H-DP and R-3) on the site into one Neighborhood Business zone classification (C-2), which is consistent with the planning and zoning classifications for the adjacent commercial properties, including the three remaining corners of the intersection.

- ✓ The proposed Neighborhood Business zone classification (C-2) is consistent with the Major Commercial planning designation proposed for the property in the County-initiated update to the general plan.

- ✓ Consolidating the zone classifications on the site allows for this uniquely large commercial site to be appropriately redeveloped in its entirety.

- ✓ The Limited Multiple Residence zone classification (R-3) that exists on a small portion of the property is not appropriate for this intense commercial corner at the intersection of two major highways. The majority of the adjacent residential properties are already nonconforming, with substandard lot sizes and setbacks.

- ✓ Commercial development will provide an appropriate buffer for the existing residential development from Rosemead Boulevard.

- ✓ Redevelopment of this aging commercial center will significantly upgrade and modernize the appearance of the property and will provide an incentive to remove the blight on other properties at this major intersection and along the Rosemead commercial corridor.

- ✓ The proposed Kohl's store made possible by the zone change will serve the local neighborhood, especially the high-density neighborhood located southerly of the project. Neighboring residents will have the opportunity to purchase nearby most everything they need for themselves and their home—clothes, shoes and accessories, and necessary home products like small electrics, bedding, luggage and other similar items.

- ✓ The zone change will allow for the reintroduction of a neighborhood-serving department store into an area that has lost this important commercial component to the nearby regional shopping centers on Foothill Boulevard and at the Santa Anita mall.

- ✓ The project will boost the local economy by providing approximately 150 additional high-quality jobs and by generating increased tax revenues that will help fund important public services in the community.

MEMORANDUM

To:	Dwight Steinert Planning Associates, Inc.	Date:	September 12, 2005
From:	David S. Shender, P.E. Linscott, Law & Greenspan, Engineers	LLG Ref:	1-033347-1
Subject:	Kohl's Commercial Development Project Review of Jones Engineers Letter		

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This memorandum has been prepared by Linscott, Law & Greenspan, Engineers (LLG) to respond to the comments prepared by Jones Engineers regarding the Traffic Impact Study for the Kohl's Commercial Development Project dated May19, 2005 (the "Kohl's traffic study"). A copy of the July 20, 2005 Jones Engineers letter (the "Jones letter") is provided in ***Appendix A*** attached to this memorandum. The Jones letter has been annotated to summarize the comments based on the general issue areas, which are responded to accordingly in this memorandum.

As a general observation, the Jones letter correctly acknowledges in the first paragraph of the document that it is not a traffic report or engineering analysis. Instead, the Jones letter represents the comments from an out-of-state enterprise that, based on the content of the correspondence, does not have experience in preparing traffic impact studies for development projects in unincorporated Los Angeles County (or likely in Southern California). The comments relate more to the County's requirements for preparation of traffic studies for development projects, rather than to the specific adequacy of the Kohl's traffic study. It is our understanding that the County's traffic study requirements, which from our experience are similar to guidelines found in other jurisdictions in Southern California, have been developed to be in compliance with the requirements of the California Environmental Quality Act (CEQA), as well as other applicable County and State laws. In general, the Jones letter does not raise objections to the Kohl's traffic study in terms of its compliance with the County's traffic study requirements.

Response to Comment No. 1: Adjustment to Traffic Volumes

It is noted that LLG prepared the Kohl's traffic study in coordination with the County of Los Angeles Department of Public Works (LACDPW), and in compliance with the requirements outlined in the "Los Angeles County Impact Analysis Report Guidelines," January 1, 1997 (the "Guidelines"). A copy of the Guidelines is provided in ***Appendix B*** attached to this memorandum. In addition, LLG relied on the firm's nearly 40 years of experience in preparing traffic studies for development projects located in unincorporated areas of Los Angeles County, as well as throughout Southern California.

LACDPW issued a letter dated July 14, 2005 stating its concurrence with the findings of the Kohl's traffic study and their recommended conditions of approval. A copy of the LACDPW July 14, 2005 letter is provided in ***Appendix C*** attached to this memorandum.

The Guidelines do not require that the vehicular turning movement traffic counts at the study intersections be conducted on more than one day. Further, our firm has prepared hundreds of traffic studies—both for the County of Los Angeles, as well as other jurisdictions in Southern California—based on a single day of traffic counts. Typically, the traffic counts are taken on a Tuesday, Wednesday or Thursday, and generally when nearby schools are in session. For analysis of the commuter afternoon peak hour (PM peak hour), the traffic counts are conducted from 4:00 PM to 6:00 PM, with the highest period of traffic over a 60 minute period within the two hour data collection period utilized in the traffic analysis (e.g., 4:45-5:45 PM). Thus, as required by the Guidelines, the traffic count data collected for the Kohl's traffic study reflect recurring traffic conditions that can be found during the highest one hour of peak of activity in a typical weekday.

It is further noted that the traffic counts and resulting Level of Service calculations provided in the Kohl's traffic study reflect existing observed conditions during the afternoon commuter peak hour at the study intersections (e.g., LOS E or "busy/congested" traffic conditions was calculated at the Rosemead Boulevard/Huntington Drive intersection, consistent with observed operations). This rejects the contention in the Jones letter that the traffic counts used in the Kohl's traffic study are not reflective of observed current conditions.

The Guidelines do not require any further adjustments to the traffic count data based on the month in which the traffic count data is collected. Further, the Guidelines do not require the use of a peak hour factor[1] (which is generally used to factor hourly traffic count data to a peak 15-minute period) Thus, no adjustments to the traffic count data collected for the Kohl's traffic study are required.

The comments in the Jones letter disputing the 0.07 adjustment to the volume-to-capacity (V/C) ratio demonstrate a lack of understanding regarding how the traffic operational benefits of a synchronized traffic signal system are incorporated into the LACDPW intersection Level of Service calculations. The synchronization of traffic signals in a corridor such as Huntington Drive represents an increase in capacity by operating the traffic signals on a more efficient basis. The City of Los Angeles Department of Transportation (LADOT) has conducted extensive before and after studies to measure the effectiveness of synchronized traffic signal systems and

[1] Peak hour factors are used to analyze hourly traffic count data into a 15-minute peak basis. The Guidelines require traffic studies to analyze conditions on a peak hour basis, not a peak 15-minute basis. Therefore, use of a peak hour factor was not required in the Kohl's traffic study.

determined that motorist travel times can be reduced by 12 to 15% on a synchronized roadway network (with even greater improvements noted on some corridors). For purposes of preparing traffic studies for development projects, LACDPW (similar to other jurisdictions in Southern California) uses a conservatively low adjustment factor of 7% (i.e., 0.07) applied to the intersection V/C ratio to represent the effects of a synchronized traffic signal operation. The Huntington Drive traffic signal synchronization system represents a permanent capacity enhancement (e.g., similar to an extra travel lane), and the benefits of such a system do not "expire" as suggested in the Jones letter. Therefore, the intersection analysis in the Kohl's traffic study with respect to the effectiveness of the Huntington Drive traffic signal synchronization system is appropriate and does not require modification.

Response to Comment No. 2: Baseline Traffic Data

As mentioned above, the Kohl's traffic study follows the Guidelines published by LACDPW. The traffic study evaluates the project's potential impacts during the weekday commuter peak hour, generally the period of the day when the streets in the project area experience the highest amount of traffic. The Guidelines do not require review and analysis of Average Daily Traffic (ADT) volumes on the local street system, as such an analysis would be more generalized in nature (i.e., traffic averaged over a 24-hour period), and thus would not effectively disclose the potential traffic impacts of a development project as compared to the required peak hour analysis. The trip generation table in the Kohl's traffic study (Table 2) does provide a daily traffic volume forecast for the project for informational purposes.

As also previously noted, the traffic counts used in the Kohl's traffic study were collected during the weekday afternoon commuter peak period when nearby schools were in session. The traffic counts represent peak traffic during conditions that motorists can expect on a recurring basis. Further, the Jones letter does not provide any analysis or data to suggest that traffic volumes are 40% higher during other months of the year. Further, the Jones letter does not explain why it would be meaningful to conduct traffic counts on the I-210 freeway in conjunction with the review of intersection Level of Service[2]Additionally, the Guidelines require the traffic analysis to be conducted on a peak hour basis, and not over a peak 15 minutes as would be derived by use of a peak hour adjustment factor as suggested in the Jones letter.

Manual traffic counts at the site driveways are not required as the potential trips generated by the existing uses on-site are appropriately accounted for in the trip

[2] The Kohl's traffic study provides a detailed review of the project's potential traffic impacts to the I-210 Foothill Freeway. This analysis includes the use of existing traffic count data for the freeway as provided by Caltrans.

generation calculation (Table 2 of the Kohl's traffic study). As noted in the Jones letter, the trip generation calculation in the Kohl's traffic study has been prepared using the appropriate trip rates listed in the *Trip Generation* manual published by the Institute of Transportation Engineers (ITE). As shown in the table, a trip generation "credit" was conservatively taken in the Kohl's traffic study for only those existing on-site uses that were open at the time of the traffic counts. For example, no trip generation credit was taken for the existing Steak 'n Stein restaurant building (approximately 13,000 square feet) that operated at Clearman's Village for a number of years, but was closed at the time of the intersection traffic counts. Should the project developer decide not to redevelop the Clearman's Village site, it is reasonable to assume that the existing retail and restaurant buildings on the site (including the Steak n' Stein) would be refurbished and marketed so as to attract its highest level of patronage. Thus, the trip generation calculations contained in Table 2 of the Kohl's traffic study likely understate the potential number of trips that would be generated by the existing uses on the site (i.e., thereby "overstating" the potential net new trips generated by the proposed redevelopment of the site).

Response to Comment No. 3: Traffic Queuing

The LACDPW Guidelines require the use of the Intersection Capacity Utilization (ICU) method for purposes of determining Levels of Service (LOS) at intersections evaluated in traffic impacts studies for development projects. The ICU methodology is an appropriate planning tool to allow traffic engineers and decision-makers to reasonably assess the relative significance of potential traffic impacts related to development projects. The ICU methodology is used by most jurisdictions in Southern California in traffic impacts studies for development projects. More specifically, the neighboring cities of Arcadia and Pasadena require the use of the ICU methodology in preparation of traffic studies for development projects within their own jurisdictions (contrary to the statement in the Jones letter). Additionally, Caltrans accepts traffic studies utilizing the ICU methodology. Attached in ***Appendix D*** are the letters documenting the acceptance of the Kohl's traffic study by Arcadia, Pasadena and Caltrans.

The ICU methodology is used to assign Levels of Service to the study intersections during the commuter peak hours. The LOS qualitatively describes the type of condition that motorists would encounter at the intersection during the peak hour. In Southern California, traffic engineers and planners are familiar with the concept of the range of Levels of Service, understanding the LOS A and B represent conditions with little or no motorist delay while LOS E and F signify congested traffic conditions. Thus, the traffic operations analysis methodology outlined in the *Highway Capacity Manual* (HCM) is not required for use in qualitatively describing intersection operations in the Kohl's traffic study. As noted in the Jones letter, the HCM methodology is appropriately applicable in a technical traffic operations review

(e.g., for determining lengths of left-turn pockets at intersections), but is not required in the planning realm of assessing the relative traffic effects of development projects on an area roadway network.

Response to Comment No. 4: Traffic Accidents and Safety

The LACDPW Guidelines do not require an inventory of traffic accidents as part of a traffic study for development projects. LACDPW will require that driveway features related to site vehicular ingress and egress be designed to in compliance with County traffic safety standards. Additionally, traffic mitigation measures required to be constructed at off-site intersections in conjunction with the Kohl's project would need to be designed to the applicable County and/or Caltrans safety standards. At other locations, the contribution of project-related traffic has been determined by the County to be so small as to be considered insignificant, thereby not adversely impacting traffic safety.

Response to Comment No. 5: Trip Generation

The calculation of project trip generation in the Kohl's traffic study was prepared in compliance with the LACDPW Guidelines, and in fact is highly conservative (i.e., "worst case") in terms of forecasting the potential number of new vehicle trips on the roadway system due to the project. The 20% percent pass-by/internal capture factor cited in the Jones letter was applied only to the Galley restaurant component of the project. No adjustment (i.e., reduction) was made to the potential trip generation forecast for the Kohl's department store to account for pass-by trips and/or "internal capture." Realistically, it is anticipated that Kohl's will derive a significant portion of its patronage during the afternoon peak hours from commuters driving by the site on Rosemead Boulevard and Huntington Drive on their way home from work. These motorists are already driving by the site, and thus would not constitute as new vehicles on Rosemead and Huntington generated by the project. Additionally, no reduction in the trip generation forecast in the Kohl's traffic study was taken for Kohl's patrons who may also eat at the Galley or North Woods restaurants (i.e., an internal capture reduction). For example, Page 46 of the "Trip Generation Handbook", June 2004, published by the Institute of Transportation Engineers (ITE) states that the expected average pass-by trip percentage for a retail use the size of the proposed Kohl's store is 34% during the PM peak hour. In addition, page 93 of the "Trip Generation Handbook" states that the internal capture between retail uses is 20% during the PM peak hour. Thus, a 54% reduction in the project trip generation forecast could have been justified in the Kohl's traffic study based on pass-by and internal capture rates recommended by ITE, however, no such reduction was applied. As previously noted, both LACDPW and Caltrans have stated their concurrence with the Kohl's traffic study.

As previously discussed, it is not appropriate to conduct counts at the existing site driveways for purposes of estimating the trip generation potential of the existing commercial uses on-site, due to the current reduced business and leasing activity in progress in anticipation of a redevelopment of the project site. The applicable ITE trip generation rates provide the best analytical means of estimating trip generation associated with the existing uses on-site for purposes of comparing the relative traffic impacts of the proposed project to the uses that were in operation at the time of the traffic counts in 2003. Neither LACDPW nor Caltrans have has objected to the trip generation methodology utilized in Kohl's traffic study.

As previously noted, the afternoon commuter peak hour is the time period required for analysis in the traffic study by LACDPW as it represents both the highest level of traffic on the adjacent streets, as well as a peak level of trip generation activity at the project site. Therefore, the greatest potential for the project to cause an impact that would be considered significant is during the afternoon commuter peak hour. The comment incorrectly suggests that the vehicular trip generation activity of the Kohl's store may be substantially higher at other times during the day as compared to the afternoon commuter peak hour (e.g., between 5:00 and 6:00 PM) which was analyzed in the Kohl's traffic study. Contrary to the assertions in the Jones letter, Table 1 on page 1449 in the ITE *Trip Generation* manual shows that the highest hour of trip generation activity for retail centers with less than 100,000 square feet of leasable area during the weekday occurs during the 5:00-6:00 PM hour. Therefore, the selection of the commuter peak hour as the analysis period for the Kohl's traffic study has resulted in an appropriately conservative analysis of potential traffic impacts due to the project.

Response to Comment No. 6: Trip Distribution

The assignment of project-related trips to the local street system is discussed in the Kohl's traffic study beginning on page 18. A discussion of the potential number of project-related peak hour trips using local streets is provided in the Kohl's traffic study beginning on page 57. Peak hour vehicle trips traveling to and from the project site were assigned to the street system in consideration of the location of the project access points, the characteristics of the adjacent street system, and the anticipated regional distribution of travel origins and destinations. The project trip distribution was submitted for review and approved by LACDPW prior to incorporation into the Kohl's traffic study.

The Jones letter makes an assertion that "cut through" traffic will be a "problem for both residential neighborhoods and commercial sites" near the Rosemead Boulevard/Huntington Drive and Rosemead Boulevard/Fairview Avenue intersections. What the Jones letter fails to do is 1) provide a clear definition of what

it considers to be "cut through" traffic, 2) identify the specific streets (and commercial sites) on which cut through traffic can be expected to occur due to the proposed project, and 3) quantify the specific contribution of "cut through" traffic that it believes will be generated by the project.

The Kohl's traffic study provides a detailed forecast of the number of project-related trips expected to use local streets on a recurring basis during the weekday PM peak hour. Additional analysis is provided regarding why the contribution of project-related traffic to streets such as Madre Street, Muscatel Avenue, California Boulevard, San Pasqual Street, Lotus Avenue and Fairview Avenue (west of the project site) is expected to be relatively minimal. As the project site will be served by driveways on Rosemead Boulevard and Huntington Drive, it is reasonable to expect that most of the vehicular traffic traveling to and from the site will utilize these roadways. Similarly, use of extended segments of streets parallel to Rosemead Boulevard and Huntington Drive by significant numbers of project-related vehicles is not expected, primarily because these parallel streets do not provide convenient access to the site. For example, the Madre Street/Huntington Drive intersection is not signalized, and left-turn movements from southbound Madre Street to eastbound Huntington Drive (i.e., towards the project site) are not permitted. Therefore, it would be unreasonable to expect project-bound motorists to use Madre Street to access the site.

LACDPW and Caltrans have required a secondary project site driveway on Fairview Avenue. While traffic control features such as signage and roadway channelization will be installed to direct project-related traffic using this driveway to and from Rosemead Boulevard, there is the potential that some project-related vehicles may ignore the signage/channelization and use Fairview Avenue west of the project site. Accordingly, LACDPW has required the monitoring of traffic on Fairview Avenue following occupancy of the project for purposes of determining if the increases in traffic volume on Fairview Avenue exceed thresholds designated in the LACDPW traffic study approval letter (if such thresholds for increases in traffic volume are exceeded, LACDPW will install traffic calming devices using funds to be deposited by the project prior to occupancy).

It is incorrect to speculate that the project will increase congestion at the Rosemead Boulevard/Huntington Drive intersection such that the project will indirectly cause a diversion of traffic onto parallel streets. In fact, the project in combination with the traffic mitigation measures required for the project by LACDPW and Caltrans will effectively improve, and not degrade conditions at the Rosemead Boulevard/Huntington Drive intersection during the AM and PM commuter peak hours. Table 7 of the Kohl's traffic study provides a summary of the Level of Service calculations which shows that the V/C ratio at the Rosemead Boulevard/Huntington Drive intersection will be better in the condition with project traffic and mitigation measures as compared to the year 2006 "without project" condition. Therefore, the

project and its associated traffic mitigation would stabilize, and potentially reduce the occurrence of motorists who may currently use alternative routes due to the current and/or future level of traffic at the Rosemead Boulevard/Huntington Drive intersection.

The Jones Engineers letter incorrectly states that there are five lanes on Huntington Drive as there are only four through lanes on Huntington Drive adjacent to the project driveway. Further, the driveway on Huntington Drive is located approximately 450 feet from Rosemead Boulevard, not 300 feet as stated in the Jones letter.

The Jones letter overstates the number of project-related vehicles that are forecast to turn left on eastbound Huntington Drive at the Rosemead Boulevard intersection. As indicated on page 22 of the Kohl's traffic study on Figure 7, Project Traffic Volumes – PM peak hour, approximately 64 net new vehicle project trips during the PM peak hour are forecast to exit the driveway on Huntington Drive and turn left at the Rosemead Boulevard intersection. This equates to approximately one additional vehicle per minute forecast to exit the driveway and turn left on Huntington Drive at Rosemead Boulevard. Based on the regular gaps in traffic provided by the downstream traffic signals on Huntington Drive located west of the project site, the forecast of approximately one additional vehicle per minute is not unreasonable in an urban environment.

Response to Comment No. 7: Level of Service Analysis

LACDPW does not specifically require Level of Service analyses of project driveways. However, LACDPW does review site access and internal circulation, with appropriate comments and recommendations provided in the LACDPW traffic study approval letter. For example, based on the LACDPW input, the project will have the following site access features:

- Huntington Drive Driveway. The Huntington Drive driveway has been located at the westerly end of the project site (i.e., the furthest point on Huntington Drive west of the Rosemead Boulevard intersection) so as to reduce potential conflicts with the Rosemead Boulevard/Huntington Drive intersection. The existing curb lane on Huntington Drive is sufficiently wide (approximately 20 feet in width) such that right-turns into the driveway can be made without adversely affecting the through traffic flow. The internal throat leading to the driveway is nearly 300 feet in length (accommodating approximately 12-15 cars), thereby negating any possibility that vehicles exiting the site onto Huntington Drive would queue into the parking area.

- Rosemead Boulevard Driveway. LACDPW and Caltrans required the dedication of property and widening of Rosemead Boulevard along the project frontage to provide a right-turn deceleration lane for project traffic turning right into the main project driveway. Appendix E of the Kohl's traffic study provides a Level of Service and vehicle queuing analysis for vehicles turning left into the driveway from northbound Rosemead Boulevard, and turning right from the driveway onto southbound Rosemead Boulevard. The analysis in the traffic study indicates that a LOS C is forecast for both turning movements during the peak hour, with 95th percentile queuing expected to be less than one vehicle. Therefore, the left-turn and right-turn lanes serving the Rosemead Boulevard project driveway will be adequate.

- Fairview Avenue Driveway. The Fairview Avenue driveway is an existing driveway that will be modified to accommodate right-turn movements into the driveway, and left-turn movements from the driveway (i.e., directing all project-related traffic to and from Rosemead Boulevard). As the existing level of traffic on Fairview Avenue is relatively light (i.e., approximately two vehicles per minute on average on Fairview Avenue at the existing site driveway during the weekday PM peak hour based on data provided Figure 4 of the Kohl's traffic study), no vehicle queuing or delay is expected at this driveway.

Response to Comment No. 8: Neighborhood Impacts

The analysis of project-related trips using the local street system has been suitably addressed in prior sections of this letter. This portion of the Jones letter repeats comments and assertions stated earlier in their correspondence. The issues raised in the comment regarding purported impacts to neighborhood streets are specifically addressed in Response to Comment No. 6 herein. Therefore, no additional response is required.

Please call with any questions or comments regarding these responses to the Jones letter.

cc: File

APPENDIX A

JONES ENGINEERING LETTER

(626) 7920941 To: BRUCE CHOW

03-147-5

July 20, 2005

Mr. John Henning

Draft Traffic Impact Report Comments
Re: Clearman's Village Commercial Site

Dear Mr. Henning,
This memorandum is a summary of traffic and transportation issues that arise from the "Environmental Impact Report Clearman's Village Project". This assessment does not claim to be a traffic report or Engineering analysis.

Purpose

The purpose of this document is to provide the client with a broad-brush evaluation of the adequacy of the environmental documents listed below with respect to traffic and transportation issues, to document obvious inconsistencies, to highlight incomplete or analysis, and to explain how seemingly inconsequential analysis assumptions or technical analysis may result in significant individual and/or cumulative impacts

Documents Reviewed:

- "Draft Environmental Impact Report, Clearman's Village Project". County of Los Angeles
- "Appendices to the Draft Environmental Impact Report, Clearman's Village project". November 2004
- "Traffic Impact Study for Kohl's Commercial Development Project", California, Linscott, Law & Greenspan, Engineers, May 19 2005.
- Letter dated June 2, 2005 from Daryl Koutnik, Supervising Regional Planner, Los Angeles County Department of Regional Planning to All Interested Parties, Re: "Revised Project Description".

Reference Documents:
The following documents were referenced in order to evaluate the above-mentioned documents:

- Los Angeles County Impact Analysis Report Guidelines, January 1997.
- "Intersection Capacity Utilization Intersection Capacity Utilization 2000, A Procedure for Evaluating Signalized Intersections, Trafficware Corporation, Albany, CA 94706, 2000.
- Trip Generation, 6th Edition, Institute of Transportation Engineers, 1997.
- Highway Capacity Manual, Special Report 209, Transportation Research Board.
- Manual of Traffic Engineering Studies, Institute of Transportation Engineers, 1976.
- Traffic Engineering Handbook, Institute of Transportation Engineers, 1992.

Data

- 7/12/05, Queue Length at selected Rosemead intersections, prepared by Maria Damario.
- 7/12/06, Peak Hour Arterial Travel Times – Rosemead, Huntington and California Streets, prepared by Maria Damario.

General Observations

The general traffic and transportation issues for the Traffic Impact Study dated May 19, 2005, are as follows:

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(1)

Adjustment of Traffic Volumes

Traffic volumes appear to be based upon a single count without adjustment for day of week or month of year, volume adjustment, or reference to permanent counting stations. Yet, significant changes in delay and queue length were observed in the field during the peak hour. In particular, it is apparent that the study did not use a "peak hour factor," i.e., a factor less than 1 that accounts for the inefficiency of the system during peak hours. Such peak-hour factors are typically between 0.80 and 0.95. The failure to use a peak-hour factor tends to understate the extent of existing congestion. Appropriate volume adjustments and use of a peak hour factor would result in greater peak volumes than now shown, and would match the delays observed in the field.

For four intersections on Huntington Blvd. (including Huntington and Rosemead), the study has applied a substantial v/c credit of 0.07 against future traffic volume/capacity counts "to reflect the planned traffic signal synchronization system" on Huntington Blvd." [See May 19 study, page 32, Table 7, note [a]. The effect of this credit is to reduce the degradation of traffic that would otherwise occur with the addition of the new project and other increases in ambient traffic over time. To illustrate the sheer size of the credit, the County's own guidelines provide that for an intersection at LOS E or F (which is the LOS for three of the four studied intersections on Huntington), a project causing a v/c change of just 0.01 is considered to have a significant impact for purposes of the California Environmental Quality Act ("CEQA"). Therefore, the credit used here is seven times larger than the change that would be deemed a significant impact. However, I am informed that the County's synchronization system for Huntington Blvd. was in place and operating, with virtually all of the benefits already accruing, by year 2000, which is three years before the existing traffic counts were taken in year 2003. Given that existing v/c ratios are based on these traffic counts, the 2003 data would already reflect any benefit from synchronization and no further credit is warranted in the future.
To illustrate, the design year mitigated scenario without the credit would result in a v/c at Rosemead and Huntington would be 0.934 not .864; the v/c at the intersection of San Gabriel / Huntington would be 0.95, not 0.883, and the California / Huntington intersection would have a v/c of 1.34 not 0.944. All represent an increase greater than the allowed 0.01 v/c allowed for intersections with an existing LOS of E or F.

(2)

Baseline Traffic Data

Existing (baseline) daily traffic volumes and future (design year) volumes on nearby collectors and arterials are not reported. [Without this data, no comparison may be made between existing daily traffic and future year daily traffic. Reporting the existing and design year daily traffic volume is a standard practice endorsed by the Institute of Transportation Engineers ("ITE") and provides verification and overall context within with to evaluate peak hour traffic changes. Typically, peak hour traffic is 10% of daily traffic, if existing and design year daily volumes were reported, a cross check for peak hour volumes is built in to the analysis.

Volume Adjustments for daily and monthly volumes are not utilized. For example, in some areas volumes may be 40% higher during summer months than during winter months on most travel routes. Often this represents additional traffic during school sessions. Use of unadjusted count data is not generally appropriate, and must be justified. The State of California maintains numerous permanent-counting facilities including stations on I-210 which provide baseline data supporting appropriate volume adjustments.

Peak Hour Factors (PHF) are calculated and shown in the appendices, but have not been used where appropriate. For example, in appendix E the two-way intersection volume adjustment worksheet used to estimate the 95% queue length does not employ a PHF and therefore underestimates the queue length. [

Manual traffic counts were not taken at the existing project site access points to establish a baseline for comparison with new project traffic. Therefore, it is impossible to tell how many trips are being generated by the existing project, and how the trips are distributed among the various ingress and egress points. Because this baseline data was not taken, it is impossible to tell either (1) how many additional trips will be

generated by the new project; and (2) the difference in traffic conflicts (i.e., conflicts with traffic flow on access streets as cars slow down to enter, or as they slowly exist the project) between the existing and new projects.

The failure to take manual traffic counts at the existing project has likely led to an underestimation of the impacts of the project. Here, the methodology used in the study for establishing a baseline traffic count for the existing project was purely hypothetical, i.e., it was based upon standard ITE trip generation rates for existing development on the site. This is not a proper substitute for manual traffic counts, especially given the project proponent's contention that existing uses are generally not successful and would hence naturally generate less traffic than typical development of similar size. The ITE rates are compiled from economically active, viable land uses. Because the use of this hypothetical baseline likely overestimates existing project traffic, it is likely to reduce the difference in the report between existing project traffic and new project traffic, thereby underestimating the additional traffic volume attributable to the project.

The failure to take manual traffic counts specifically at site access points has also deprived the study of any reasonable basis for estimating how to distribute traffic coming and going from the new project among the various access points. The study does distribute this traffic, showing, for example, that a substantial percentage(64%) of northbound traffic from the site would leave at the Huntington exit rather than through the Fairview exit. However, there is no basis stated from which the study arrived at this conclusion.

(3)

Traffic Queuing

The County allows use of an intersection capacity utilization ("ICU") methodology for determining levels of service at intersections ("LOS"). This method reports a ratio of road capacity and existing or forecast volumes, and is simple to compute, review and to verify. However, while it is useful to compare the changes within a system, it does not reflect the magnitude of delay to be expected.

The concept of level of service was developed by the Transportation Research Board (TRB) and published in the Highway Capacity Manual. The scheme for evaluating LOS in the manual is based on delay, rather than on volume and capacity. This was based on the simple intuitive fact that a "level of service" should properly reflect the expected driver delay and discomfort. Indeed, CalTrans, as well as many other local jurisdictions including the neighboring cities of Pasadena and Arcadia, require LOS calculations to be based on a delay based method, such as the Highway Capacity Manual.

Regardless of what the County may normally require, because delay is the primary factor in the decision of drivers to leave the main roadway and use cut-through alternative streets, a delay method should have been prepared here, if for no other reason than to evaluate the likelihood and extent of such traffic. Delay analysis and queuing simulations should be prepared for both existing and design year traffic conditions, and for both the peak hour of adjacent traffic and the peak hour of site generated traffic.

Delay analysis also helps to avoid undersizing turn lane pockets, and to helps to anticipate possible access impediments caused by spillback queues (i.e. queues that block traffic from access to turn lanes at their access point), thereby and benefiting both the project owner and the public. Here, field observations and photos confirm that spillback queues already occur in the system and sometimes block intersections. This spillback effect is a major reason drivers seek alternate routes, cutting through neighborhoods.

(4)

Traffic Accidents and Safety

There is no discussion of traffic accidents or safety. A limited accident inventory should be prepared to identify existing accident-prone location within the study area. This is especially true given numerous reports by residents of accidents both on the main arterials and on local collector streets.

(5) ***Trip Generation***

In calculating the total trips generated by the new project, the study uses standard ITE trip generation rates. The total trips are then reduced by the expected number of "pass-by" and "internal capture" trips, based on the theory that such trips would not be added to the system by the project. The Caltrans Guidelines for the Preparation of Traffic Impact Studies limits the number of pass-by and internal capture trips to 15% of PM trip generation. Yet the study uses a 20%, figure, with the effect that the peak hour trip generation for the new project is reduced by an additional 5% of total PM peak hour traffic. No justification is given for using this higher figure. Further, the County of Los Angeles Guidelines require that "Internal or pass-by trip reduction assumptions will require analytical support based upon verifiable actual similar developments to demonstrate how the figures were derived and will require approval by the County". The study contains no analytical support at all, nor any indication of County approval, for a 20% pass-by/internal capture rate...

Additional trip Project trip generation credits are claimed on Table 2, Page 19 of the traffic report. The reductions assume that ITE trip generation rates may replace actual driveway counts to determine the baseline traffic at the site accesses. However, typically only an actual count of existing trips in and out of the site is used for such a credit, and no such count was done here. Further, even for future trip generation, the ITE trip generation manual encourages use of locally derived trip generation rates, based upon similar land uses in the vicinity, rather than standard ITE rates.

Project peak hour trip generation is not computed as recommended in the CALTRANS Guidelines. ? The project's peak hour trips (as opposed to the projects trip generation during peak hours) may have a greater impact to the system even if they occur outside of the peak hours. Although this is not required for all projects, it would be appropriate for a commercial project fronting a busy arterial.

(6) ***Trip Distribution***

In the study virtually all traffic is distributed / assigned to existing principal arterials. The study makes no allowance for such traffic to impact neighborhoods. Many of the neighborhood collector streets are wide, they have spacious parking minimizing side friction and best of all, and they have comparatively low traffic volumes. It is very unlikely that cut through traffic will not be a problem for both residential neighborhoods and commercial sites near the intersection of Rosemead and Huntington and at Rosemead and Fairview.

There is also no reasonable justification for trip distribution among the various ingress/egress points on the project site. In particular, Figure 5 "Project Trip Distribution" on page 20 indicates that 62% of all trips exiting the site will be turning right onto Huntington and 47% of the site trips turn left at the Huntington / Rosemead intersection. The distribution source us unidentified, but it seems highly unlikely that most of the trips leaving the site will exit onto the most congested adjacent street at a right turn only exit. 62% of ALL trips (Table 2, page 19) is 125 vehicles per hour turning right. Further the maneuver that most of these trips are predicted to take is extraordinarily difficult given distance and existing traffic levels. Of the total of 125 trips turning right on Huntington, 95 are expected to cross 5 lanes of traffic, in a distance of only approximately 300 feet to enter the eastbound Huntington left turn lane. Except at times of day when traffic is extremely light, it is highly unlikely that vehicles could easily make this weaving maneuver, as moving traffic (or worse, queuing traffic) will either frustrate or block the maneuver. Further, because no counts were done of egress from the existing project, there is no evidence that substantial numbers of cars actually perform this maneuver now. Such evidence should be developed to verify the distribution analysis and to evaluate the effect of increased volumes through this weaving section.

(7) ***Level of Service Analysis***

There has been no level of service (LOS) calculated for the existing access points to the site. If site access driveways operate at a low level of service than it could be concluded that access design should be

reconfigured or that unanticipated offsite impacts such as excessive queues should be expected to be formed. This is a standard requirement for site traffic analysis; it also serves to report the expected turning volumes from the site to the adjacent roadways. Without this information, it is impossible to assess potential impacts to traffic safety, onsite queues, or unanticipated traffic conflict points. Without an LOS baseline for the access points, it is impossible to compare the existing site access to design year LOS at the project access points.

(8) *Neighborhood Impacts*

One of the most intractable traffic problems is cut through traffic. It is vital to provide a connected community, not only for residential access, but also for emergency vehicle access. Yet, with the exception of narrative on pages 57 through 59, the traffic analysis does not evaluate secondary streets. Rather, the study is focused on the intersections along the principle arterials.

The deficiencies described elsewhere in this report, if corrected, may result in much higher calculated volumes on Rosemead, Huntington, Fairview than those presented in the study and will likely result in utilization of parallel collector streets by existing and new trips, both project bound and non project bound, known commonly as "cut-through" traffic. Further, the study has not planned for this greater utilization of collector streets by implementing arterial and neighborhood improvements that would discourage such cut-through traffic.

In particular, residential neighborhoods north and south of the proposed project may experience additional cut through traffic as volumes increase on Rosemead and Huntington, as traffic attempts to access the site at a mid-block access point and as exiting traffic congests Huntington near the eastbound left turn lane.

Observations

The existing intersections are operating close to capacity in the existing conditions.
There is a 100% observed increase in travel time and 50% increase in queue lengths along Rosemead within the peak hour indicating that volume adjustments would be appropriate.The traffic analysis allows for significant trip generation and level of service analysis credits that benefit the project and are not justified. The expected level of service reported on Table 7 for the California / Huntington intersection includes a 0.07 v/c credit without which the intersection would operate a LOS F. Other intersections, described above, would have increases in v/c ratios greater than allowed by the County Guidelines.

Sincerely,
Bryan Jones

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